NO. FBT CV 15 6048103 S : SUPERIOR COURT

DONNA L. SOTO, ADMINISTRATRIX OF THE ESTATE OF

VICTORIA L. SOTO, ET AL : JUDICIAL DISTRICT OF FAIRFIELD

V. : AT BRIDGEPORT

**BUSHMASTER FIREARMS** 

INTERNATIONAL, LLC, a/k/a, ET AL : AUGUST 17, 2016

## MOTION FOR EXTENSION OF TIME TO OBJECT AND/OR RESPOND TO THE REMINGTON DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Practice Book Section 13-7(a)(3), the plaintiffs in the above-captioned case hereby move for an additional extension of time, from the due date of August 31, 2016 until September 30, 2016, in which to object and/or respond to the Motion for Summary Judgment of Remington Arms Company, LLC, and Remington Outdoor Company, Inc., dated August 1, 2016. Plaintiffs seek an extension of thirty (30) days (from August 31, 2016 to September 30, 2016) due to long-standing vacation plans of Attorneys Alinor Sterling and Katherine Mesner-Hage during the weeks of August 15 and August 22, 2016. Additionally, it is the belief of counsel for the plaintiffs that the deadline for responding to the Motion for Summary Judgment is set by the Scheduling Order and falls in November of 2017. That deadline has not been modified, although it appears the Remington defendants hope it will be. Nonetheless, in an excess of caution, plaintiffs' counsel is filing this motion seeking an extension to file any response, including a response directed to scheduling. Plaintiffs' counsel has made inquiry to counsel for all defendants. Attorney James Vogts, counsel for the Remington defendants, does not consent to this extension of time.

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## THE PLAINTIFFS,

By

/s/ Alinor C. Sterling

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## **CERTIFICATION**

This is to certify that a copy of the foregoing has been mailed, postage prepaid, and emailed this day to all counsel of record, to wit:

For Bushmaster Firearms International LLC, a/k/a;

Freedom Group, Inc., a/k/a;

Bushmaster Firearms, a/k/a;

Bushmaster Firearms, Inc., a/k/a;

Bushmaster Holdings, Inc., a/k/a

Remington Arms Company, LLC, a/k/a;

Remington Outdoor Company, Inc., a/k/a

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